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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA
ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**STIPULATION AND [PROPOSED]
ORDER REGARDING SCHOOL
DISTRICT BELLWETHER SEARCH
TERMS**

This Document Relates To:

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

*Baltimore County Board of Education
v. Meta, et al., Case No. 24-cv-01561*

*Board of Education Harford County v.
Meta, et al., Case No. 23-cv-03065*

*Board of Education of Jordan School
District v. Meta, et al., Case No. 24-cv-
01377*

*Breathitt County Board of Education v.
Meta, et al., Case No. 23-cv-01804*

*Charleston County School District v.
Meta, et al., Case No. 23-cv-04659*

*Dekalb County School District v. Meta,
et al., Case No. 23-cv-05733*

*Irvington Public Schools v. Meta, et al.,
Case No. 23-cv-01467*

*Saint Charles Parish Public Schools v.
Meta, et al., Case No. 24-cv-01098*

*School District of the Chathams v.
Meta, et al., Case No. 23-cv-01466*

*Spartanburg 6 School District v. Meta,
et al., Case No. 24-cv-00106*

*The School Board of Hillsborough
County, Florida v. Meta, et al., Case
No. 24-cv-01573*

*Tucson Unified School District v. Meta,
et al., Case No. 24-cv-01382*

Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby stipulate to the below provisions regarding the search terms to be applied to the School District Bellwether Plaintiffs' ("SD Plaintiffs") collections. Through lengthy negotiations, both Parties made meaningful compromises since the September 12, 2024 Discovery Management Conference to reach agreement on the search terms. *See* ECF 1120 (Joint status report, at 23-27); ECF 1132 (Joint letter brief regarding disputes); ECF 1157 (Discovery Management Order No. 10, at 9-11, ordering additional meet and confer); ECF 1163 (Stipulated order granting additional time for status report); ECF 1176 (Status report); ECF 1192 (Status report); ECF 1203 (Joint letter brief regarding unresolved disputes). This stipulation resolves all disputes with respect to the SD Plaintiffs' common search terms.

The Parties hereby stipulate:

1. The SD Plaintiffs will apply the agreed search terms to their collections in accordance with the responses and objections to Defendants' requests for production of documents.

2. The deadline for the SD Plaintiffs to substantially complete their production of documents in response to Defendants' requests for production will be extended 45 days from November 5, 2024, to December 20, 2024. The Parties will discuss a production schedule for priority custodians' interim production dates.

3. The deadline for Defendants to take the depositions of the SD Plaintiffs' fact witnesses will be extended until May 15, 2025, with the understanding that the Parties will endeavor and use best efforts to conduct the SD Plaintiffs' fact witnesses' depositions prior to May 10, 2025.

4. Extending these deadlines will not affect any other deadline ordered by the Court.

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the Parties stipulate and respectfully request that the Court extend the above deadlines.

IT IS SO ORDERED.

DATED: _____

PETER H. KANG
UNITED STATES MAGISTRATE JUDGE

1 **IT IS SO STIPULATED AND AGREED.**

2 DATED: October 22, 2024

Respectfully submitted,

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ATTESTATION

I, Chaloea Williams, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 22, 2024

By: /s/Chaloea Williams

Chaloea Williams